

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FRANSSEN CONDOMINIUM  
ASSOCIATION OF APARTMENT  
OWNERS, a Washington non-profit  
corporation,

Plaintiff,

v.

COUNTRY MUTUAL INSURANCE  
COMPANY, an Illinois company;  
FARMINGTON CASUALTY COMPANY, a  
Connecticut company; THE TRAVELERS  
INDEMNITY COMPANY, a Connecticut  
company; THE TRAVELERS INDEMNITY  
COMPANY OF AMERICA, a Connecticut  
company; and TRAVELERS CASUALTY  
INSURANCE COMPANY OF AMERICA, a  
Connecticut company,

Defendants.

No.: 2:21-cv-00295-BJR

STIPULATED MOTION AND ORDER TO  
CONTINUE CERTAIN PRE-TRIAL  
DEADLINES

Plaintiff Franssen Condominium Association of Apartment Owners and Defendants  
Country Mutual Insurance Company, Farmington Casualty Company, The Travelers  
Indemnity Company, The Travelers Indemnity Company of America, and Travelers Casualty  
Insurance Company of America (collectively, the “Parties”) respectfully request a short, 14-  
day extension of certain pretrial deadlines in this lawsuit. The requested extension should

not impact the trial date.

Difficulties with scheduling depositions, including expert depositions, have led to a limited amount of time between these depositions and the deadline to file dispositive motions and motions under *Daubert* and its progeny. To accommodate witness schedules, and allow for more adequate time to complete key depositions and prepare any applicable motions, the Parties stipulate to the following 14-day extension of certain pretrial case deadlines:<sup>1</sup>

Event	Current Deadline	New Deadline
Deadline to Take Expert Depositions	July 22, 2022	August 5, 2022
Deadline to File All Dispositive Motions	August 2, 2022	August 16, 2022
Discovery completed by	August 5, 2022	August 19, 2022
All motions <i>in limine</i> must be filed by	October 31, 2022	No change
Joint Pretrial Statement	November 7, 2022	No Change
Pretrial conference	November 21, 2022	No Change
Jury Trial Date	December 5, 2022	No Change
Length of Jury Trial	7-10 days	No Change

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of certain pretrial deadlines, set out above. The Parties do not believe that their requested changes will require rescheduling the trial.

DATED: July 12, 2022

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<sup>1</sup> Dkt 42.

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Attorneys for Defendants Farmington  
Casualty Company, The Travelers Indemnity  
Company, The Travelers Indemnity Company  
of America, and Travelers Casualty Insurance  
Company of America

IT IS SO ORDERED this 18th day of July, 2022.



THE HONORABLE BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE

4858-9885-6489.1